

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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United States of America,

Case No. 21-cr-108(PAM/TNL)

Plaintiff,

v.

DEFENDANT THOMAS LANE'S  
OBJECTION TO GOVERNMENT'S  
COMBINED VIDEO EVIDENCE &  
EXHIBIT 90

Thomas Lane,

Defendant.

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The defendant, Thomas Lane, through his counsel, Earl P. Gray, objects to Exhibit 90 the "timeline" of the government as being cherry picked and inaccurate. He also objects to the combined videos of Lane and Kueng, and the combined video of Lane and Frazier's video because defendant Lane, from where he was positioned, could not see Floyd's "facial expressions", and a combination video of both Lane's BWC and Kueng's BWC is cumulative evidence and unfair. The proposed evidence violates Rule 403 of the Federal Rules of Evidence because it is deceiving and substantially prejudicial with no probative value.

Dated this 3<sup>rd</sup> day of February, 2022.

Respectfully submitted,

s/Earl P. Gray  
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